

**IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF ALABAMA  
NORTHERN DIVISION**

<b>ELIZABETH HORTON,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>vs.</b>	)	<b>CASE NO. 2:06-CV-00526-MHT-DRB</b>
	)	
<b>DON WILLIAMS, et al.,</b>	)	
	)	
<b>Defendants.</b>	)	

**DEFENDANT SHOCKLEY'S EXHIBIT LIST**

Defendant Gerald Shockley pursuant to the Court's Scheduling Order in this matter and Rule 26(a)(3) of the Federal Rules of Civil Procedure, designates the following exhibits:

<b>A</b>	Deposition of Elizabeth Horton, w/ exhibits: Notice of Deposition Duces Tecum 3/22/06 termination letter from Hyundai NSM client database with notations by Horton 1/24/05 Application to Hyundai Horton resume
<b>B</b>	Deposition of Felicia Barrow, w/ exhibits: 1. 5/9/05 transcript of interview with Don Williams 2. 6/23/05 transcript of interview with Felicia Barrow
<b>C</b>	Deposition of Cliff Johnson, w/ exhibit: 1. 6/14/05 and 7/12/04 Memoranda from Johnson re: NSM
<b>D</b>	Deposition of Anthony Green, w/ exhibits: 1. Confidential Medicaid Complaint and Report of Investigation 2. NSM client database with notations by Horton 3. 8/12/05 Summary Report of Investigation by Shockley
<b>E</b>	First affidavit of Gerald G. Shockley w/ attachments: 1. 7/9/04 referral memorandum 2. 6/1/05 transcript of interview with Michael Roeder 3. Affidavit and Warrant
<b>F</b>	Second affidavit of Gerald Shockley w/ attachment: A. 8/12/05 Summary Report of Investigation by Shockley

<b>G</b>	Affidavit of Michael Roeder
<b>H</b>	Affidavit of Don Williams
<b>I</b>	Declaration of Danielle Pirkle w/ exhibit: A. 6/28/05 transcript of interview with Danielle Pirkle
<b>J</b>	Medical Records for Elizabeth Horton:  Advanced Medical Imaging Records for Horton Baptist Medical South Records for Horton Bridger Pathology Lab Records for Horton Dr. Goodman Medical Records for Horton Dr. Huynh medical records for Horton Dr. Jacob Griffin's Records for Horton Dr. King Medical Records for Horton Dr. Looney medical records for Horton Dr. May medical records for Horton Dr. Pinchback medical records for Horton Jackson Hospital Medical Records for Horton Pri-Med Medical Records for Horton Southern Diagnostic Labs Records for Horton Taylor Eye Clinic Records for Horton
<b>K</b>	Alabama Medicaid Agency Investigation File
<b>L</b>	Employment Records for Elizabeth Horton from Kelly Services
<b>M</b>	Employment Records for Elizabeth Horton from Hyundai Motor Manufacturing Alabama, LLC

Defendant Gerald Shockley reserves the right (a) to supplement this list, (b) not to offer and/or to object to the use of all or any portion of the foregoing by any other party, (c) to offer as a separate exhibit any portion of or any summary of any of the foregoing, (d) to offer an enlargement of any of the foregoing, (e) to use any document identified in subsequent discovery, (f) to use any exhibit listed by any other party if Defendant's objection thereto is waived or overruled, (g) to use any document marked as an exhibit during any deposition in this matter, (h) to use other documents for rebuttal and/or impeachment, (i) to use any documents which have been requested or produced during discovery in this case, regardless whether the same has been produced, (j) to use any document produced by any non-party, and (k) to use any document requested of any non-party, regardless whether the same has been produced.

Respectfully submitted on this the 14th day of May, 2008.

TROY KING  
ATTORNEY GENERAL

/s/ Jack Wallace, Jr.  
Jack Wallace, Jr.  
Assistant Attorney General

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**CERTIFICATE OF SERVICE**

I hereby certify that I have, this the 14th day of May, 2008, electronically filed the foregoing with the Clerk of Court using the CM/ECF. The Clerk of Court using the CM/ECF system will send notification of this filing to the following:

Deborah M. Nickson  
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/s/ Jack Wallace, Jr.  
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